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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

BLACKWATER LODGE AND TRAINING CENTER, INC., a Delaware Corporation dba BLACKWATER WORLDWIDE, Plaintiff, v. KELLY BROUGHTON, in his capacity as Director the Development Services Department of the City of San Diego; THE DEVELOPMENT SERVICES DEPARTMENT OF THE CITY OF SAN DIEGO, an agency of the City of San Diego; AFSANEH AHMADI, in her capacity as the Chief Building Official for the City of San Diego; THE CITY OF SAN DIEGO, a municipal entity; and DOES 1-20, inclusive, Defendants.	Case No. 08 CV 0926 H (WMC) **DECLARATION OF SHAWN K. BROWN IN SUPPORT OF CITY DEFENDANTS' RESPONSE IN OPPOSITION TO PLAINTIFF BLACKWATER'S REQUEST FOR OSC: REGARDING ISSUANCE OF PRELIMINARY INJUNCTION** Date: June 17, 2008 Time: 10:30 a.m. Courtroom: 13 Judge: Hon. Marilyn L. Huff

/ / /

I, Shawn K. Brown, hereby declare as follows:

1. I am employed by the City of San Diego, in the office of City Attorney as an Investigator. I have been in this position since August 6, 2001. One of the matters I to which have been assigned tasks to investigate is in connection with the above-referenced litigation. I have personal knowledge of the matters stated herein, except for those matters stated on information and belief, which I believe to be true. I could and would competently testify to the matters stated herein if called as a witness to do so.

2. In my capacity above described, I was tasked to determine what business related information could be obtained in connection with respect to Southwest Law Enforcement Training Enterprises ("SLETE"). This entity is referenced in the declaration of Brian Bonfiglio, which I understand was filed with this Court related to the above-captioned matter in the following manner: that "Blackwater initially decided to enter into a joint venture with a partnership named Southwest Law Enforcement Training Enterprises, because of its capabilities." Decl. of Bonfiglio ISO *Ex Parte* App. For TRO ("Bonfiglio Decl."), ¶10.

3. It further is my understanding that all businesses operating in the City of San Diego are required to obtain a business tax certificate. On their business tax certificate application, the applicant is instructed to identify all "dba's" or names under which it will be doing business. For purposes of my employment, I have access to computerized information containing the names of businesses. It is my understanding that Blackwater Lodge And Training Center, Inc., is in the City's business tax database. This database contains no entry for Southwest Law Enforcement Training Enterprises, however.

4. As part of my investigation, I also made inquiries of the licenses that have been issued to any "Firearm Training Facility" in the city or county of San Diego. A complete listing of all licenses, including those that have been cancelled, is maintained by the California Department of Consumer Affairs ("DCA"). I accessed the DCA's internet database to determine if either "Southwest Law Enforcement Training Enterprises" or "Blackwater Lodge And Training Center" was on the DCA list of licensed Firearm Training Facilities. The website location is http://www2.dca.ca.gov/pls/wllpub/wllquery$.startup, which allows any person to determine the

license status of a variety of professions or businesses, including the so-called "Firearm Training Facility" category. A licensed professional or facility can be searched by license number, if known, as well as name, address, city or county location. I did a "City Location" search in the city of San Diego and eighteen entries were included. However, neither "Southwest Law Enforcement Training Enterprises" or "Blackwater Lodge And Training Center" was on the DCA list of licensed Firearm Training Facilities. I also did a separate name search utilizing "Southwest" and "Blackwater." No entries came up on this search. A true and correct copy of my search results is attached hereto.

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I declare under penalty of perjury of the laws of the State of California, as well as the United States, that the foregoing is true and correct and that this declaration was executed on June 9TH, 2008, at San Diego, California.

SHAWN K. BROWN

Search Results for Firearm Training Facility

This information is updated Monday through Friday - Last updated: JUN-08-2008

To see all the information for a licensee, click on the highlighted name. This will also include disciplinary actions if any are present.

Name	Type	Number	Status	Address	City	Zip	County
ABSOLUTE TACTICAL TRAINING	TFF	1212	CLEAR	3674 VILLA TERRACE SUITE C	SAN DIEGO	92104	SAN DIEGO
ADVANCED TRAINING ASOCIATION	TFF	778	CANCELLED	3305 ADAMS AVENUE #223	SAN DIEGO	92116	SAN DIEGO
BRINK'S, INC	TFF	1034	CLEAR	4520 FEDERAL BLVD #A	SAN DIEGO	92102	SAN DIEGO
DECAPRIO SECURITY SERVICES	TFF	1214	CLEAR	9320 HAZARD WAY #C1	SAN DIEGO	92123	SAN DIEGO
K-TECH SECURITY & TACTICAL TRAINING	TFF	1094	CLEAR	2573 MARKET ST	SAN DIEGO	92102	SAN DIEGO
MORRISON FIREARMS ACADEMY	TFF	502	CLEAR	4046 CASEMAN AVE	SAN DIEGO	92154	SAN DIEGO
NATIONAL ACADEMY OF PRIVATE SECURITY OFFICERS	TFF	752	CANCELLED	6035 UNIVERSITY AVENUE #19	SAN DIEGO	92115	SAN DIEGO
NATIONAL TRAINING FOUNDATION	TFF	1038	CANCELLED/DEATH	6156 MISSION GORGE ROAD_STE N	SAN DIEGO	92120	SAN DIEGO
PUBLIC SAFETY TRAINING ASSOC	TFF	4	CLEAR	7875 CONVOY COURT STE #3	SAN DIEGO	92111	SAN DIEGO
RJ'S TRAINING ACADEMY	TFF	1156	CLEAR	4455 TWAIN AVE STE E	SAN DIEGO	92102	SAN DIEGO
THE WACKENHUT CORPORATION	TFF	1083	CANCELLED	2515 CAMINO DEL RIO SO #138	SAN DIEGO	92108	SAN DIEGO
UNIVERSITY OF SAN DIEGO	TFF	1103	DELINQUENT	5998 ALCALA PARK	SAN DIEGO	92110	SAN DIEGO
UNIVERSITY OF SAN DIEGO	TFF	685	CANCELLED	5998 ALCALA PARK	SAN DIEGO	92110	SAN DIEGO
W.C. PICKET FIREARMS SAFETY TRAINING	TFF	766	CANCELLED	6322 CLYDE AVE	SAN DIEGO	92139	SAN DIEGO

Records 1 to 14

First Previous

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Search Results for Firearm Training Facility

This information is updated Monday through Friday - Last updated: JUN-08-2008

To see all the information for a licensee, click on the highlighted name. This will also include disciplinary actions if any are present.

No records returned

Please see the Search Instructions for more details in finding a licensee.

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SOUTHWEST

Search Results for Firearm Training Facility

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No records returned

Please see the Search Instructions for more details in finding a licensee.

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